

September 9, 2010

**FILED ELECTRONICALLY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Notice of Ex Parte Presentation**  
**WT Docket No. 02-55**  
**ET Docket Nos. 00-258 and 95-18**  
**New DBSD Satellite Services G.P., Applications for Transfer of Control**  
**File Nos. SAT-T/C-20091211-00144, et al.**

Dear Ms. Dortch:

On September 8, 2010, Craig McCaw, Ben Wolff, R. Gerard Salemmme of ICO Global Communications (Holdings) Limited ("ICO Global") and the undersigned met with Chairman Genachowski, along with Edward Lazarus, chief of staff; Rick Kaplan, chief counsel to the Chairman; Mindel De La Torre, chief of the International Bureau; Austin Schlick, general counsel; and Julius Knapp, chief of the Office of Engineering and Technology, regarding the above-captioned proceedings. We also met separately on September 8 with Angela Giancarlo, chief of staff to Commissioner McDowell; Charles Mathias, legal advisor to Commissioner Baker; and John Giusti, chief of staff to Commissioner Copps, regarding these proceedings.

In the meetings, we reiterated the points that ICO Global has made in its prior filings and ex parte presentations in these proceedings as summarized in the attached bullet points. In particular, we stressed that it would be improper to consider ICO Global to be part of a single entity engaged in the MSS business and thus liable for reimbursing Sprint's BAS relocation costs. While there may be limited, fact specific circumstances in which it is appropriate for the Commission to extend a licensee's obligations to affiliates of the licensee, this is not one of them. To do so here would also stifle investment by creating a risk for future shareholders in Commission licensees that they could be held liable at some indeterminate future date for the licensee's obligations.

We also noted that not only would it be legally impermissible to impose liability for relocation costs on ICO Global, it would be grossly unfair. ICO Global (even prior to the formation of DBSD in 2005) never utilized the BAS spectrum or received any benefit from

**Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.**

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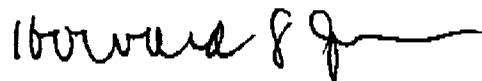
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Sprint's delayed and inexplicably expensive band clearing activities, and it never will now that it has lost all but a minimal interest in DBSD following DBSD's exit from bankruptcy.

Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter and attachment is being filed electronically with the Office of the Secretary and served electronically on the Commission participants in the meetings.

Should there be any questions regarding this matter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard J. Symons", with a long horizontal flourish extending to the right.

Howard J. Symons

Attachment

cc: Hon. Julius Genachowski  
Edward Lazarus  
Rick Kaplan  
Mindel De La Torre  
Austin Schlick  
Julius Knapp  
Angela Giancarlo  
Charles Mathias  
John Giusti